

# EXHIBIT 4

**From:** [Beral, Arash](#)  
**To:** [Murphy, Michael D.](#); [Malynn, Todd M.](#)  
**Cc:** [Zollicoffer, Jordan](#); [James, Pauletta](#)  
**Subject:** [EXT] RE: Meet and Confer  
**Date:** Thursday, March 6, 2025 4:32:34 PM

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The analysis doesn't change. The Court wants to see us agree on a reasonable attorney fee as a result of you bringing the motion against PCJV and Koren. Can you send us the fee invoices today to review?

**Arash Beral** | BLANKROME  
2029 Century Park East | Los Angeles, CA 90067  
[Arash Beral](#) | [Blank Rome LLP](#)

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**From:** Murphy, Michael D. <mdmurphy@foxrothschild.com>  
**Sent:** Thursday, March 6, 2025 12:56 PM  
**To:** Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>  
**Cc:** Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; James, Pauletta <PJJames@foxrothschild.com>  
**Subject:** RE: Meet and Confer

Ok. Thank you for clarifying. That, then, should change your analysis as to damages. If it is not our job to monitor and force compliance, isn't any dollar our client pays towards getting compliance a damage? Put differently, as having been held in contempt, your client has been ruled as knowingly refused to comply. We have been trying to address this since the order issued in November. Does that not mean every effort we have taken in the face of knowing non compliance is a damage to which our client is entitled to recover?

And yes, pics are embedded.

[Redacted]


[Redacted]

**Michael Murphy**

Partner

[Redacted] (213) 213-1211

[Redacted]

 (310) 974-2271 (cell)  
 [mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

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**From:** Beral, Arash <arash.beral@blankrome.com>  
**Sent:** Thursday, March 6, 2025 12:50 PM  
**To:** Murphy, Michael D. <mdmurphy@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>  
**Cc:** Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; James, Pauletta <PJJames@foxrothschild.com>  
**Subject:** [EXT] RE: Meet and Confer

Re-sending the below as I got bounce-back messages.

**Arash Beral** | BLANK**ROME**  
2029 Century Park East | Los Angeles, CA 90067  
[Arash Beral | Blank Rome LLP](#)

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**From:** Beral, Arash  
**Sent:** Thursday, March 6, 2025 12:46 PM  
**To:** 'Murphy, Michael D.' <mdmurphy@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>  
**Cc:** Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; James, Pauletta <PJJames@foxrothschild.com>  
**Subject:** RE: Meet and Confer

Thank you. We did not suggest it is your client's job to monitor compliance. We just want the documents and information you're relying on so that we can help resolve these issues.

Were there supposed to be attachments (I don't see any) or just the pictures interposed within the email?

**Arash Beral** | BLANK**ROME**  
2029 Century Park East | Los Angeles, CA 90067  
[Arash Beral | Blank Rome LLP](#)

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**From:** Murphy, Michael D. <mdmurphy@foxrothschild.com>  
**Sent:** Thursday, March 6, 2025 12:29 PM  
**To:** Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>  
**Cc:** Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; James, Pauletta

<PJames@foxrothschild.com>

**Subject:** RE: Meet and Confer

Arash:

First, good meeting yesterday. I recommend in person as much as possible. Next time I come to you.

Second, from now on please always copy my colleagues, Jordan and Pauletta.

Third, my deliverables:

I am working on invoices.

Protective Order in the works as is my meet and confer response

As for Injunction Compliance. We ask for two things:

1. **Known Non-Compliance**: The attached (and below this email) are examples of types of non-compliant uses of trademarks with the dates, times, and locations (one week ago), noted on each picture.
  - a. As for each example, we ask for confirmation as to every store in which this remains an issue and that this has been addressed as to each store and halted. We are primarily concerned with all the stores Koren controls (whether owned by a Korean entity / Defendant, or still a friendly franchisee). So, for example, identify every non fixture sign at all stores that has been taken down since last Monday, with pictures.
  - b. If your client deems any use “impossible” to cease and impossible to remove this use of a trademark, we require the following for each independent use:
    - i. Identify every use of this type at any store Koren controls, along with a picture so we can cross check.
    - ii. Provide an explanation as to each use, why it is impossible, with direct evidence as to why you believe it is impossible.
    - iii. Describe what is being done now to take care of each use.
    - iv. Describe when that attempt to cure the “impossible” uses

began.

v. Advise when you believe they will be resolved.

c. For example, for the last category below, signs that are fixtures, for each sign that is a fixture

i. Identify every sign that has a prohibited trademark on it along with a picture and location description

ii. Note I AM NOT conceding that a lease requirement or landlord instruction is an impossibility or supersedes a court injunction, but you do, and we are entitled to an explanation. So, here, as an example you might say “this is impossible because of clause x in the attached relevant lease, and because of this email from the landlord who said I don’t care if you go to jail.”

iii. What is being done to remove the sign.

iv. When those efforts began.

v. When the sign will be taken down.

2. **Unknown Non-Compliance:** Yesterday it was suggested that it is our client’s job to monitor compliance. I disagree. It is your client’s job to comply. We should have not had to do anything. These statements suggested that your client believes that any Unknown Non-Compliance is permissible. Accordingly, here is where candor and disclosure will go a long way.

a. For each other use of any mark other than that we have discovered (maybe at one of the stores we did not check, or another type of use we did not see), please affirmatively disclose every use of this type at any store Koren controls, along with a picture so we can cross check. Then, please apply the impossibility question to these as set forth above. If any use has been addressed, answer the questions in 1(a), or if deemed impossible, answer the questions in 1(b).

The pictures are attached of different categories:

1. Non fixture signs
2. Receipts
3. Cardboard / paper / foam paper type standalone uses
4. Fixture signs

Thank you

[REDACTED]

[REDACTED]

**Michael Murphy**

Partner

[REDACTED] (213) 213-1211

[REDACTED] (310) 974-2271 (cell)

[REDACTED] [mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

[REDACTED]

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Sent:** Thursday, March 6, 2025 11:42 AM

**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Malynn, Todd M.

<[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Kenneth Hsu <[khsu@ecjlaw.com](mailto:khsu@ecjlaw.com)>

**Subject:** [EXT] RE: Meet and Confer

Mike:

Following up on nos. 1 and 2 below, as well as (per our discussion in person yesterday) your fee information on the contempt motion matters. Can you send everything to us today? I have hearings today at 1:30 and then tomorrow in person at 11 am and 1:45 pm (with clients each time) at Spring Street. I don't have a lot of free time to address all these matters with the PCJV parties, and it's already almost the end of the workweek.

Arash

**Arash Beral** | BLANK**ROME**

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

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**From:** Beral, Arash

**Sent:** Tuesday, March 4, 2025 2:10 PM

**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Malynn, Todd M.

<[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Kenneth Hsu <[khsu@ecjlaw.com](mailto:khsu@ecjlaw.com)>

**Subject:** RE: Meet and Confer

Mike:

Todd and I were able to clear most of our schedule tomorrow afternoon to meet in person, however, can we meet in our office or at the mezzanine level in our building complex (which has a nice, quiet lounge for us to sit and talk – there's also a Starbucks next door). I have to take off around 5 pm and walk into Beverly Hills for a board meeting, so I would appreciate us meeting closer to Century Park East. We can also meet in the outdoor courtyard area between the twin towers like we did once in the Cinco case. Can we meet at 3:30 pm?

A couple additional follow-ups:

1. I see that the Court just issued the \$5,000 attorney fee ruling. Kindly provide payment instructions asap.
2. On Friday, I sent an email asking you to produce the documents/binders you had brought with you to Court and to itemize what exactly you believe is out of compliance so that we could have our clients immediately remedy any remaining issues. We need those asap. It's already Tuesday afternoon. Can we get them today please?

Thank you, and looking forward to meeting.

Best,

Arash

**Arash Beral** | BLANKROME

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Monday, March 3, 2025 6:52 PM

**To:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Kenneth Hsu <[khsu@ecjlaw.com](mailto:khsu@ecjlaw.com)>

**Cc:** James, Pauletta <[PJames@foxrothschild.com](mailto:PJames@foxrothschild.com)>

**Subject:** Meet and Confer

Arash and Todd:

I wrote an email leaving Court on Friday inviting you to our office tomorrow or Wednesday to meet and confer, but it did not send.

So, I now try again. Can we meet and confer at m office on Wednesday? Afternoon?

Topics:

1. Injunction Compliance
2. Damages for Contempt
3. Trial Schedule
4. Resolution of Discovery Issues

Thank you!

[Redacted]

[Redacted]

**Michael Murphy**

Partner

[Redacted] (213) 213-1211

[Redacted] (310) 974-2271 (cell)

[Redacted] [mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

[Redacted]

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